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*Attorneys for Defendant
The Fairchild Corporation*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TIG INSURANCE COMPANY,

Plaintiff,

-against-

THE FAIRCHILD CORPORATION and
NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA,

Defendants.

Civil Action No. 07 Civ. 8250 (JGK)

ECF CASE

**NOTICE OF DEFENDANT
THE FAIRCHILD CORPORATION'S
MOTION TO DISMISS OR,
ALTERNATIVELY, TO STAY**

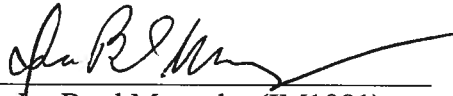
PLEASE TAKE NOTICE that upon the Declaration of Peter V. Baugher, Esq., sworn to December 10, 2007, with the exhibits thereto, and the accompanying memorandum of law, defendant THE FAIRCHILD CORPORATION ("Fairchild") will move this Court, before the Honorable John G. Koeltl, at a date and time to be determined by the Court, for an order

dismissing or, in the alternative staying, this action under the doctrine of abstention, and granting such other and further relief as the Court may deem just and proper.

Fairchild hereby requests oral argument on this motion pursuant to paragraph 2(E) of the Individual Practices of Judge Koeltl.

Dated: New York, New York
December 10, 2007

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